

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>AMRO ELANSARI,</b>	:	
<b>PLAINTIFF,</b>	:	
<b>VS.</b>	:	<b>CASE NO:</b>
<b>META, INC. D/B/A FACEBOOK</b>	:	
<b>DEFENDANT</b>	:	

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**COMPLAINT AT LAW AND IN EQUITY**

AND NOW, comes the Plaintiff, Amro Elansari, by and through himself, *pro se*, to file the instant complaint and in support thereof avers as follows:

**INTRODUCTION**

1. This is a lawsuit initiated by the Plaintiff against the Defendant for discrimination on the basis of religion pursuant to Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*
2. The Plaintiff avers the Defendant discriminated against him this week of November 22, 2021 as a Muslim by banning Palestinian Muslim News Organizations reporting on war crimes and international law violations while allowing Pro-Israel and Jewish Organizations operate on the Facebook freely posting posts inciting violence and war crimes and international law violations against Palestinian and Arab people.
3. The Plaintiff avers that the intentional act engaged in by the Defendant, the circumstances surrounding the same, and the manner in which the act was engaged in by the Defendant, together in totality, resulted in intentional public discrimination against patrons of a commercial business in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*
4. To wit, the Plaintiff is seeking injunctive relief restoring the banned Palestinian news sources, namely "Al-Qastal" and prohibiting the Defendant from continued discrimination on the basis of religion as described more fully herein, in addition to any and all other applicable relief

**PARTIES**

5. PLAINTIFF - is Amro Elansari - Plaintiff in the instant matter with an address of Address Line 1, Address Line 2 (REDACTED).
6. DEFENDANT - is Meta, Inc, doing business as Facebook, Defendant in the instant matter with an address of 1 Hacker Way, Menlo Park, CA 94025.

**JURISDICTION AND VENUE**

7. This Court has jurisdiction in the instant matter pursuant to Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* as well as 42 U.S.C. 1331 (Diversity Jurisdiction) and 42 U.S.C. § 1981(a)-(c).

8. Venue is appropriate in the instant Court since the Defendant regularly engages in business and transacts in the instant district as well as the acts complained of partially or in whole having taken place in the instant district.

### **STATEMENT OF FACT**

9. The Plaintiff is a practicing Muslim that obtains their news about Palestine / Israel / the Holy Land where Moses was led to by the Cloud of God in the Holy Torah and where Jesus Christ the Messiah in Christianity and Islam is believed to have been born from various news organizations including but not limited to, primarily, Al Qastal News which provides direct and on-the-ground updates on the Palestine / Israel conflict on a daily basis. Generally speaking, the conflict is based on the Jewish Religion's insistence on the rejection of Jesus Christ as a Prophet of God Almighty and the Holy Gospel, which Muslims believe just like Christians (as it says to in the Holy Quran), while at the same time refraining from worshipping Jesus Christ, a man, as God himself, which Muslim's believe to be blasphemous and disrespectful to the mightiness and supremacy and exaltedness of God Almighty as true monotheists, which is essentially the main difference between the three religions. In sum, Jews reject Jesus Christ the Messiah and the Holy Gospel; Christians worship Jesus Christ the Messiah as God himself; Muslims believe in Jesus as a Prophet of God like Moses and Abraham, but refrain from worshipping anyone or anything in association with the supremacy of God. And the conflict between Palestine and Israel is based on the insistence of Jews and Zionists on the rejection of Jesus Christ the Messiah in the Holy Gospel and Holy Quran (essentially claiming that Jesus Christ is a fraud and the Holy Gospel to be fake), which has resulted in numerous unlawful acts of violence and war crimes in the past 75 years or so in the unlawful occupancy of Israel in the Holy Land of Palestine and Jerusalem where Muslims have been praying for the past 1400 years since Islam was revealed and where members of the Jewish faith have been displaced from 2000 years ago following their rejection of Jesus Christ the Messiah of the Holy Gospel an Holy Quran which Muslims believe to both be revealed from God as well as the Torah (Christians only follow the Holy Gospel and Torah, not the Quran). To this date, only Palestinians are permitted to worship on the holy land pursuant to the "status quo", due to the essentially guaranteed unrest that it would cause, but this has not stopped the Jewish opposition from engaging in unthinkable and unconscionable acts of violence in the areas surrounding the Holy Area (Dome of the Rock / Church of the Holy Sepulchre / Holy Aqsa Mosque) including but not limited to (1) unlawful occupation of the West Bank under international law, (2) the intentional targeting of civilians by military, (3) the unwarranted and unjustified detention of Palestinian Arabs in detention centers / jails / prisons without fair trial or due process, (4) the practice of apartheid laws and policies that are specifically and explicitly intended to treat Arabs in the area differently from Jewish (European) settlers - all in the name of the Jewish rejection of Jesus Christ the Messiah and the Holy Gospel (and other rejection).

10. In the week of November 22, 2021, the Defendant shut down many prominent Palestine pages in an attempt to silence the Muslim perspective and narrative of the war crimes and violations of international law taking place by the illegal occupation of Israel (illegal under international law), **while at the same time not-blocking and not silencing Pro-Israel and Pro-Jewish organizations advocating violence against Arabs and Muslims which the Plaintiff avers to be explicit discrimination on the basis of religion.**

11. In fact, a report referenced herein states that Facebook has an active dialouge with the foreign government of Israel in which Defendant Facebook has given indifference to Israel Government



requests to silence Palestinian Muslim pages while at the same time not silencing or limiting Israel / Jewish pages - which the Plaintiff avers to be explicit discrimination on the basis of religion in a public context in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*

12. Based on the foregoing, the Plaintiff avers that the Defendant has engaged in intentional discrimination on the basis of religion in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*

13. Jewish users are allowed to obtain news pertaining to them from sources without obstruction while Muslim users have their news sources banned is explicit discrimination and unequal treatment engaged in by the Defendant in violation Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*

14. No just cause or justification exists for the unequal treatment, as Al Qastal news does nothing more than provide the news on international law violations and war crimes engaged in by the illegal occupancy of Israel, while at the same time allowing more violent and more radical Jewish / Zionist expressions to be made without being banned, thereby establishing a *prima facie* case of discrimination in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.*

15. Absent justification shown, the Plaintiff avers that they are entitled under Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* to seek injunctive relief remedying the acts of unequal treatment complaint of herein including but not limited to restoring the wrongfully and unlawfully banned Palestinian Muslim pages to their previous status **OR** banning the Israel Jewish pages in the same way that they banned the Muslim pages; either solution is sufficient as long as it brings both sides to equality.

16. However, numerous sources of evidence show that the Defendant organization has shown strong indifference to Jewish entities and organizations while engaging in strict and unjustified overt unequal treatment and discrimination against Palestinian and Muslim entities which the Plaintiff avers to be a very explicit and straight-forward violation of 42 U.S.C. §§ 2000a *et seq.*

17. On the basis of the foregoing and evidence submitted herein, the Plaintiff avers that they are entitled to injunctive relief as a Muslim being discriminated against by the Defendant in having their news and information sources banned while Jewish news and information sources are not banned **ORDERING** the Defendant to either restore the Palestine / Muslim pages in the same way that the Israel / Jewish pages are **OR** banning the Israel Jewish pages in the same way that the Muslim pages are banned; either solution is sufficient as long as it brings both sides to equality.

18. It will depend on the response of the Defendant, for their reasons provided for the unequal treatment in this *prima facie* case of unequal treatment, which solution is more appropriate. If Defendant Facebook does not want Palestine / Israel conflict on their platform, then they should do away with both Muslim and Jewish groups - or - if they want to promote free speech and news and media - they should restore Muslim pages to their status prior to the unequal treatment relative to the Jewish pages. However, the continued unequal treatment and discrimination of one

group and not the other on the basis of religion, the Plaintiff avers, is an explicit violation of 42 U.S.C. §§ 2000a *et seq.* that must be remedied.

19. The Plaintiff is seeking injunctive relief from this Court ordering the Defendant to desist from unequal treatment on the basis of religion in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* as well as any and all other applicable relief deemed necessary including but not limited to monetary compensation for the costs associated with the preparation of the instant lawsuit and litigation of the instant matter.

**COUNT I**  
**UNLAWFUL DISCRIMINATION ON THE BASIS OF RELIGION**  
**IN VIOLATION OF 42 U.S.C. § 2000a et seq.**

20. The Plaintiff hereby references and incorporates Paragraphs 1 through 20 as though set forth at length herein.

21. In order to state a claim under 42 U.S.C. § 2000a, a plaintiff must establish that they were deprived of the full and equal enjoyment of a public accommodation on the grounds of race, color, religion, or national origin. See 42 U.S.C. § 2000a(a).

22. The unequal treatment on the basis of religion is clear in the instant matter, the Defendant has engaged in overt acts of unequal treatment on the basis of religion in their banning of Palestine / Muslim pages in the week of November 22, 2021.

23. Public accommodations is defined under 42 U.S.C. § 12181(7) as

**(7)Public accommodation**

The following private entities are considered public accommodations for purposes of this subchapter, if the operations of such entities affect commerce—

(A)an inn, hotel, motel, or other place of lodging, except for an establishment located within a building that contains not more than five rooms for rent or hire and that is actually occupied by the proprietor of such establishment as the residence of such proprietor;

(B)a restaurant, bar, or other establishment serving food or drink;

(C)a motion picture house, theater, concert hall, stadium, or other place of exhibition or entertainment;

(D)an auditorium, convention center, lecture hall, or other place of public gathering;

(E)a bakery, grocery store, clothing store, hardware store, shopping center, or other sales or rental establishment;

(F)a laundromat, dry-cleaner, bank, barber shop, beauty shop, travel service, shoe repair service, funeral parlor, gas station, office of an accountant or lawyer, pharmacy, insurance office, professional office of a health care provider, hospital, or other service establishment;

(G)a terminal, depot, or other station used for specified public transportation;



(H)a museum, library, gallery, or other place of public display or collection;

(I)a park, zoo, amusement park, or other place of recreation;

(J)a nursery, elementary, secondary, undergraduate, or postgraduate private school, or other place of education;

(K)a day care center, senior citizen center, homeless shelter, food bank, adoption agency, or other social service center establishment; and

(L)a gymnasium, health spa, bowling alley, golf course, or other place of exercise or recreation.

24. The Plaintiff avers that the Defendant by and through its maintenance of its servers in California which users (Muslim and Jewish alike) “gather”, physically or virtually notwithstanding, constitutes public accommodation pursuant to 42 U.S.C. § 12181(7) (d) which includes (D) an auditorium, convention center, lecture hall, or other place of public gathering; which the Plaintiff avers qualifies the Defendant for jurisdiction under Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* This is likely an unprecedented legal question for this Court to answer throughout the course of this litigation, but should answer in favor of finding the Defendant social network platform as “other place of public gathering” as defined in 42 U.S.C. § 12181(7) (d) because it is indeed a “place of public gathering”; virtually / non-virtually notwithstanding. In fact, no other function of “social media networks” exists other than to “gather” people, because “social media networks” by facial definition of the term itself by nature, implies “public gathering” in its nature. This Court should find the same and qualify the Defendant as a “place of public gathering” and therefore subject to jurisdiction of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* for this reason.

25. If it is true that the Defendant has engaged in overt against on the basis of religion and that the Defendant is indeed a public accommodation / place of gathering, then the Defendant should be subject to jurisdiction of this Court under Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* which would then warrant the granting of injunctive relief ordering the Defendant to desist from continued unlawful unequal treatment on the basis of religion.

26. The Plaintiff is seeking injunctive relief from this Court ordering the Defendant to desist from unequal treatment on the basis of religion in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* as well as any and all other applicable relief deemed necessary including but not limited to monetary compensation for the costs associated with the preparation of the instant lawsuit and litigation of the instant matter.

27. 42 U.S.C. §§ 2000a *et seq.* Requires Equal Access as follows:

(a) Equal Access - All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in this section, without discrimination or segregation on the ground of race, color, religion, or national origin.

28. Subsection (b) defines (b)Establishments affecting interstate commerce or supported in their activities by State action as places of public accommodation; lodgings; facilities principally

engaged in selling food for consumption on the premises; gasoline stations; places of exhibition or entertainment; other covered establishments as follows: Each of the following establishments which serves the public is a place of public accommodation within the meaning of this subchapter if its operations affect commerce, or if discrimination or segregation by it is supported by State action:

- (1) any inn, hotel, motel, or other establishment which provides lodging to transient guests, other than an establishment located within a building which contains not more than five rooms for rent or hire and which is actually occupied by the proprietor of such establishment as his residence;
- (2) any restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility principally engaged in selling food for consumption on the premises, including, but not limited to, any such facility located on the premises of any retail establishment; or any gasoline station;
- (3) any motion picture house, theater, concert hall, sports arena, stadium **or other place of exhibition or entertainment; and**
- (4) any establishment (A)(i) which is physically located within the premises of any establishment otherwise covered by this subsection, or (ii) within the premises of which is physically located any such covered establishment, and (B) which holds itself out as serving patrons of such covered establishment.

29. Plaintiff avers that the Defendant falls under the jurisdiction of this Court pursuant to 42 U.S.C. §§ 2000a *et seq.* (b) (3) which prohibits discrimination in any motion picture house, theater, concert hall, sports arena, stadium **or other place of exhibition or entertainment;**

30. Plaintiff strictly avers that the Defendant is an “other place of exhibition and / or entertainment” (hence - the function of a ‘social media network’ - which is to exhibit and entertain in the commercial interest of profit simultaneously in the context of interstate commerce.

31. Therefore, the Plaintiff avers, physically or virtually notwithstanding, the Defendant’s unequal treatment in an “other place of exhibit or entertainment” qualifies the Defendant for jurisdiction of this Honorable Court’s authority pursuant to 42 U.S.C. §§ 2000a *et seq.*; which this Honorable Court should find the same.

32. Moreover, the Plaintiff points to the outrageous nature of the conduct and the seriousness of the acts complained of to influence the discretionary authority of this Honorable Court to treat the claims in the instant matter strictly due to the fundamental strict scrutiny violations engaged in by the Defendant - i.e. Explicit Discrimination on the Basis of Religion - to warrant this Honorable Court’s exceptional consideration of the instant matter and to perhaps even consider extraordinary and unprecedented relief. However, at a minimum, the Plaintiff avers that enough has been stated to substantiate a valid claim of unequal treatment in the context of a public accommodation as prohibited under 42 U.S.C. §§ 2000a *et seq* thereby warranting this Honorable Court to issue injunctive relief ordering the Defendant to desist from the same in one way or another.



33. The Plaintiff does not care whether or not both Muslim / Jewish pages are banned or both Muslim / Jewish pages are not banned - but the Plaintiff avers that unequal treatment between the two is strictly against the law.

34. The Plaintiff avers that this Honorable Court has the legal obligation to construe the claims of the Plaintiff *Pro-Se* litigant liberally, and so if there is a similar cause of action such as 42 U.S.C. § 1981 that applies instead, or this Court's authority in general equity, that this Honorable Court has a duty to allow the instant matter to proceed on the basis of such instead.

35. The Plaintiff is seeking injunctive relief from this Court ordering the Defendant to desist from unequal treatment on the basis of religion in violation of Title II of the Civil Rights Act codified as 42 U.S.C. §§ 2000a *et seq.* as well as any and all other applicable relief deemed necessary including but not limited to monetary compensation for the costs associated with the preparation of the instant lawsuit and litigation of the instant matter.

## **COUNT II** **RELIEF IN EQUITY**

36. The Plaintiff hereby references and incorporates Paragraphs 1 through 35 as though set forth at length herein.

37. The **Federal Equity Rules** were court rules that, until 1938, governed civil procedure in suits of equity in federal courts. The Rules were established by the United States Supreme Court which was authorized by the United States Congress to make rules governing the form of mesne process, form and mode of proceeding in suits of equity and the power to proscribe form of process, mode of framing and filing of proceedings or pleading and generally regulate the whole process of suits in equity.<sup>[2]</sup> Sets of rules were promulgated in 1822, 1842 (amended in 1850, 1854, 1861, 1864, 1869, 1871, 1875, 1879, 1882, 1890, 1892, 1893 and 1894),<sup>[3]</sup> and in 1912 (amended in 1924, 1930 and 1932).<sup>[4]</sup> The 1912 Rules were superseded in 1938 by the Federal Rules of Civil Procedure which were largely based on the 1912 Rules.

38. (a) The federal courts have the equity jurisdiction that was exercised by the English Court of Chancery at the time the Constitution was adopted and the Judiciary Act of 1789 was enacted. Pp. 318-319.

39. Equitable remedies are available when legal remedies won't make the nonbreaching party whole.

40. Here, the Plaintiff and Defendant have a contract defined and expressed through the Defendant's terms and use of service in which the Plaintiff provides their usership in exchange for the Defendant Platform benefitting from that usership and using that usership to obtain profit through advertising. However, these terms of agreement also implicate any and all federal laws pertaining to unequal treatment, discrimination, fraud, and / or equity, as may the circumstances require.

41. The Plaintiff avers that the principles of equity in federal court apply in the instant matter where the Plaintiff Muslim is not made whole in the banning of Muslim Palestine news sources while simultaneously Jewish Israel news sources advocating violence to Arabs and war crimes and violations of international law are permitted to operate freely.

42. The Plaintiff avers that the over acts of the Defendant to treat one group unequally to another are actions that make the Plaintiff "not whole" in being able to obtain their news from Muslim sources the same way that Jewish users are able to obtain their news from Jewish sources which warrants this Court's granting of injunctive relief in equity to "restore the parties whole".

43. The Plaintiff is seeking injunctive relief from this Honorable Court ORDERING the Defendant to desist the unequal inequitable misconduct described herein to restore the Plaintiff "whole" as they were prior to the overt acts of unequal treatment on the basis of religion described herein.

**COUNT III**  
**RACIAL DISCRIMINATION IN CONTRACTUAL RELATIONSHIPS**  
**IN VIOLATION OF 42 U.S.C. § 1981**  
**(Plead In The Alternative)**

44. The Plaintiff hereby references and incorporates Paragraphs 1 through 35 as though set forth at length herein.

45. Section 1981 addresses racial discrimination in contractual relationships. As amended by the Civil Rights Act of 1991, the statute reads in relevant part:

- (a) All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts . . . as is enjoyed by white citizens . . .
- (b) For purposes of this section, the term "make and enforce contracts" includes the making, performance, modification, and termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship.
- (c) The rights protected by this section are protected against impairment by nongovernmental discrimination and impairment under color of State law.

See 42 U.S.C. § 1981(a)-(c).

46. See 42 U.S.C. § 1981(a)-(c). To establish a claim under Section 1981, the plaintiff must show that (1) she is a member of a racial minority; (2) the defendant had an intent to discriminate on the basis of race; and (3) the discrimination concerned one or more of the activities enumerated in the statute (i.e., the making and enforcing of a contract). See *Morris v. Office Max, Inc.*, 89 F.3d 411 (7th Cir. 1996); *Green v. State Bar of Texas*, 27 F.3d 1083, 1086 (5th Cir.1994); *Mian v. Donaldson, Lufkin & Jenrette Secs. Corp.*, 7 F.3d 1085, 1087 (2d Cir.1993); *Baker v. McDonald's Corp.*, 686 F. Supp. 1474, 1481 (S.D. Fla.1987), *aff'd* 865 F.2d 1272 (11th Cir.1988), *cert. denied*, 493 U.S. 812 (1989); *Williams v. Penn. State Police Bureau of Liquor Control Enforcement*, 108 F. Supp.2d 460 (E.D. Pa. Aug. 14, 2000); *Wood v. Cohen*, 1998 WL 88387 (E.D. Pa. Mar. 2, 1998). See also *Pamintuan v. Nanticoke Mem. Hosp.*, 192 F.2d 378 (3d Cir. 1999).

47. Plaintiff averred that the Defendant engaged in religious discrimination, but this technically can be construed as unequal treatment against the Plaintiff as being from an Arab race relative to individual users who are of a Jewish race (because Jewish can refer to either the religion or the race) which would make 42 U.S.C. § 1981(a)-(c). (unequal treatment against Non-White Arabs and Asians relative White European Jews).



48. The intent to discriminate on the basis of race by Defendant is clear in the instant matter as exhibited in numerous sources explicit communications with the foreign government of Israel which are to be requested to be disclosed in discovery.

49. (3) the discrimination concerned one or more of the activities enumerated in the statute (i.e., the making and enforcing of a contract) seems to be evidenced in the instant matter through the agreement commemorated in the Defendant's Terms of Use which the Plaintiff offers the consideration of their usership in exchange for the Defendant's ability to profit on this time and energy exerted in usership while also misrepresenting (intentionally and / or negligently notwithstanding) that users would be treated equally and that the company would maintain effort to ensure users are treated equally and fairly based on race / religion / other protected classes while it simultaneously has taken overt actions to treat one group unequally relative to another as described in the instant matter.

50. This Court should find that a contractual relationship existed between the parties, however small the consideration has been, and therefore qualify the instant matter under the jurisdiction of this Court pursuant to 42 U.S.C. § 1981(a)-(c).

51. The Plaintiff is seeking injunctive relief from this Honorable Court ORDERING the Defendant to desist the unequal inequitable misconduct described herein to restore the Plaintiff "whole" as they were prior to the overt acts of unequal treatment on the basis of race described herein.

**COUNT IV**  
**NEGLIGENT REPRESENTATION**  
**IN VIOLATION OF STATE LAW**

52. The Plaintiff hereby references and incorporates Paragraphs 1 through 35 as though set forth at length herein.

53. The elements of negligent misrepresentation under the law of Pennsylvania are similar. They are: "(1) a misrepresentation of a material fact; (2) the representor must either know of the misrepresentation, must make the misrepresentation without knowledge as to its truth or falsity or must make the representation under circumstances in which he ought to have known of its falsity; (3) the representor must intend the representation to induce another to act on it; and (4) injury must result to the party acting in justifiable reliance on the misrepresentation. Gibbs, 538 Pa. at 210, 647 A.2d at 890; Tulp v. Educational Commission for Foreign Medical Graduates, 376 F. Supp. 3d 531, 544 (E.D. Pa. 2019). "Thus negligent misrepresentation differs from intentional misrepresentation in that to commit the former, the speaker need not know his or her words are untrue, but must have failed to make reasonable investigation of the truth of those words." Gibbs, supra.

54. In the instant matter, the Defendant represents in their terms of service and various public statements made that they are a platform of equality and fairness as well as they do not tolerate discrimination in order to entice usership - for profit - while then engaging in overt acts of unequal treatment in violation of the same in violation of Pennsylvania law on negligent misrepresentation, thereby giving rise to the instant claim.

55. Pursuant to this claim, the Plaintiff would be entitled to compensatory damages as well as punitive damages, which the Plaintiff is requesting in the instant matter.

**COUNT V**  
**FRAUDULENT REPRESENTATION**  
**IN VIOLATION OF STATE LAW**

56. The Plaintiff hereby references and incorporates Paragraphs 1 through 35 as though set forth at length herein.

57. The elements of fraud under Pennsylvania law are “(1) a material factual misrepresentation; (2) made with knowledge or belief of its falsity; (3) with the intention that the other party rely thereon; (4) resulting in justifiable reliance to that party to his detriment.” *Agathos v. Starlite Motel*, 60 F.3d 143, 147 (3d Cir. 1995); see also *Moser v. DeSetta*, 589 A.2d 679, 682 (Pa. 1991); *Mellon v. Barre-National Drug Co.*, 636 A.2d 187, 189 (Pa. Super. 1993). Fraud can consist of “anything calculated to deceive, whether by single act or combination or by suppression of truth or suggestion of what is false.” *Moser*, 589 A.2d at 682; see also *Cottman Transmission Systems, Inc. v. Melody*, 869 F. Supp. 1180, 1186 n.10 (E.D. Pa. 1994).

58. Here, the Defendant has represented and continues to represent that they are a platform of equality on the basis of race in that they do not tolerate unequal treatment on the basis of such nor allow the same on their platform, while at the same time simultaneously communicating with a foreign government and coordinating the engagement of unequal treatment on the basis of race and religion.

59. The false representation is made with the intent to deceive users and potential users into using the Defendant’s platform to the Defendant’s profit, with knowledge of the falsity of the claims made therein, as evidenced through the Defendant’s conduct, thereby giving rise to the instant claim of fraudulent representation with the intent to deceive claimed herein.

60. Pursuant to this claim, the Plaintiff would be entitled to compensatory damages as well as punitive damages, which the Plaintiff is requesting in the instant matter.

**CONCLUSION**

61. This is not a case criticizing or condemning the Jewish rejection of Jesus Christ the Messiah of the Holy Bible or Holy Quran. Rather, this is a case seeking the rule of law in the United States of America as it pertains to equality and equity on the basis of race and religion.

62. I could care less if Facebook is Jewish or Muslim or Christian or Aethist with all of the gambling they advertise on their platforms (they are obviously not followers of any of the three) - I only care that people are treated equally, which I think that this Honorable Court can agree with.

63. I urge this Court to construe the claims herein liberally and ensure justice and equality and liberty and justice for all pursuant to its constitutional and statutory and executive obligations. God Almighty bless the United States of America, where people have the legal right to be treated equally and not condemned for their race or religion in one way or another, but rather have the opportunity to explore and learn for themselves within the confines of law. I pray that God



Almighty sort out the differences between all people so that we may all know the truth for sure; whether Jesus Christ the Messiah of the Holy Bible and Holy Quran was a fraud or not; and whether or not The Prophet Muhammad (Peace And Blessings Upon Him) was truthful about the revelation of the Holy Quran through the Angel Gabriel from God himself or not. No one is able to read or write at birth; it is up for each person to explore for themselves and learn for themselves. No one is perfect either, only God Almighty is perfect; and only He chooses who he guides and who he doesn't guide and who he partially guides. May God Almighty raises us all to the level of those who are rightfully guided; and protect us from the Outcast Accursed Satan who is constantly working to sow discord among people in his own rejection of God's will - which is really the true root of this problem according to the scripture. (See: Story of Adam and Eve in the Holy Torah and Holy Quran where Adam was deceived by Satan to eat from the Tree of Knowledge despite the command of God which caused him / us to be cast down from heaven to Earth where Mankind was ordered to work and sweat and till the soil for a time and to follow the guidance of God Almighty in order to return to heaven; hence, why we are on imperfect earth today as opposed to perfect heaven as Adam was originally in. The Accursed Satan / Fallen Angel of God has been an enemy of mankind from the original creation of Adam, according to the Holy Scriptures, when God created Adam from clay and ordered the Angels to bow down (in an acknowledgement of God's supremacy in creation - which they all did - except for the Accursed Satan who refused and said "why should I bow down to a man you made from clay while I am made of fire and better" to which God responded "Be gone thee, this is not a place for you to be arrogant (when I, Almighty God, created you too), and as he was being cast down the Accursed Satan said "Dear God, grant me respite until the Judgment Day and I will show you that mankind is not worthy" to which God responded "Your respite is granted" and then the Accursed Satan deceived Adam into eating from the tree of knowledge, causing mankind to be cast down from heaven as well, after which Adam asked God for forgiveness and God accepted his forgiveness, for he is the Most Forgiving, and he sent mankind down to earth for "a time" to be tested and it was said "he who follows my guidance will find themselves back into heaven, and he who ignores my guidance shall find himself in hell"; thus resulting in the life we are living here on earth today, according to the Holy Scriptures (The Holy Torah, The Holy Gospel, and the Holy Quran). And, as explained earlier, Jewish people accept the Holy Torah and Abraham and Moses, but reject Jesus Christ as a fraud and reject the Holy Gospel. Christians accept the Holy Gospel and worship Jesus Christ the Messiah as God himself. Muslims follow the Holy Quran and practice strict monotheism where they believe in Jesus Christ the Messiah as a prophet like Abraham and Moses (PBUT) and the Holy Gospel as the Holy Quran says, but refuse to associate any person or any thing in their worship of God, the same way people don't worship Moses as God himself, because that would make it polytheism and disrespectful to the oneness and Supremacy of God; and that is essentially the difference between the three. And all three are "Abrahamic faiths" - which all reject atheism (the belief that there is no Almighty God the creator the heaven and earth and the sun and the moon and all of the stars in the sky - which all reject the worshiping of statutes or false deities such as the "Sun God" or the "Greek Gods" or the "Hindu Gods" or the beliefs of Buddhism which speculate on nature and life but do not recognize the Holy Scriptures of God Almighty (The Holy Torah, The Holy Gospel, and the Holy Quran) which all reference and believe in the direct appearance of God Almighty in the story of Moses when he was leading him and his people from Egypt to the Holy Land (Jerusalem) / Dome of the Rock which was therefore "witnessed" thereby giving rise to the "Old Testament" - and where Jesus Christ the Messiah of the Holy Gospel was born and was

"witnessed" thereby giving rise to the "New Testament". In short, what separates the Abrahamic faiths from other religions is that it involves a "witnessing" of Almighty God whereas there are no other substantive recognized religions that claim any "witnessing" of the same that can be traced to actual geographic locations present to this day, such as the Holy Land where the (Dome of the Rock / Church of the Holy Sepulchre / Holy Aqsa Mosque); the religiously and racially biased censoring of new sources therefrom is precisely the subject matter complained of in the instant complaint.

64. That is the main difference between all of the religions; I am not arguing, in this case, for one or another. Rather, I am arguing that each be treated equally under the law under the laws of the United States of America which this Honorable Court has the authority and obligation to enforce.

65. It is up to you to accept Jesus Christ the Messiah, or to reject Jesus Christ as a fraud like the members of the Jewish faith. And it is up to you whether you want to worship the Sun God rather than God Almighty who created the Sun and everything in the universe. I only argue that no one should be treated unequally on the basis of their race or religion as prescribe by the laws of the United States of America, which I pray that Almighty God bless, regardless of its shortcomings, and I pray that Almighty guide the United States to the true and correct path that is so heavily disputed among people (most of which have not even read the scripture themselves and yet have an opinion on it one way or another).

#### **PRAYER FOR RELIEF**

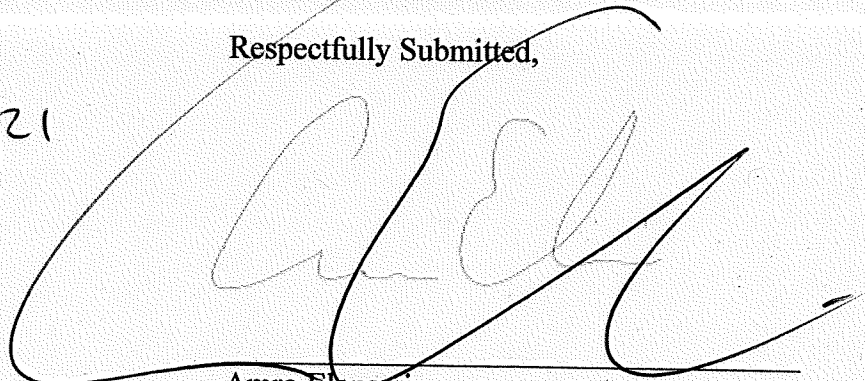
WHEREFORE, the Plaintiff respectfully requests that this Honorable Court issue judgment in favor of the Plaintiff as follows:

- (1) INJUNCTIVE RELIEF - Ordering the Defendant to desist from unequal treatment in one way or another
- (2) COMPENSATORY DAMAGES as may be prescribed by law in an amount to be determined in a trial by jury.
- (3) PUNITIVE DAMAGES as may be prescribed by law in an amount to be determined in a trial by jury.
- (4) ANY AND ALL OTHER RELIEF DEEMED NECESSARY AND APPLICABLE
- (5) COSTS AND FEES ASSOCIATED WITH THE INSTANT MATTER

Dated: ~~November 26, 2021~~

November, 29, 2021

Respectfully Submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Amro Elansari', is written over a horizontal line.

Amro Elansari  
Plaintiff - Pro Se



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS****AMRO ELANSARI****(b) County of Residence of First Listed Plaintiff**

(EXCEPT IN U.S. PLAINTIFF CASES)

**(c) Attorneys (Firm Name, Address, and Telephone Number)****DEFENDANTS****META, INC. D/B/A FACEBOOK, INC.****County of Residence of First Listed Defendant**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

**Attorneys (If Known)****II. BASIS OF JURISDICTION (Place an "X" in One Box Only)**

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)**

- Citizen of This State ☒ 1 PTF ☐ 1 DEF
- Citizen of Another State ☐ 2 ☐ 2
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3
- Incorporated or Principal Place of Business In This State ☐ 4 ☐ 4
- Incorporated and Principal Place of Business In Another State ☐ 5 ☒ 5
- Foreign Nation ☐ 6 ☐ 6

**IV. NATURE OF SUIT (Place an "X" in One Box Only)**

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN (Place an "X" in One Box Only)**

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

TITLE II OF THE CIVIL RIGHTS ACT 42 U.S.C. §§ 2000a / 42 U.S.C. § 1981 / 28 U.S.C. § 1350

Brief description of cause:

UNLAWFUL DISCRIMINATION ON THE BASIS OF RACE / RELIGION IN PUBLIC ACCOMMODATION / CONTRACT / AND RELIEF IN EQUITY

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.**DEMAND \$**  
TBDCHECK YES only if demanded in complaint:  
**JURY DEMAND:** ☒ Yes ☐ No**VIII. RELATED CASE(S)**

IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

November 29, 2021

SIGNATURE OF ATTORNEY OF RECORD (OR PARTY WITHOUT COUNSEL)

NOVEMBER 26, 2021

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44****Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.



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